

Access to Microfinance & Improved Implementation of Policy Reform (AMIR Program)

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Implementation of the Law on Food Control (SPS Compliance) and Food Standards

Final Report

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Introduction:

The focus of this mission is established in the Scope of Work: Implementation of the Law on Food Control (SPS Compliance and Food Standards), and Investor Road Map-Food Safety Inspections. The former includes a number of activities related to the Ministry of Health activities. They include:

Review of currently existing food health regulations for conformity with the provisions of the SPS Agreement;

Development of new regulations required for appropriate implementation of the draft proposed food law currently being considered by the GOJ;

Streamlining border food control related to conformity with Annex C of the SPS Agreement; and,

Providing necessary training among other activities.

The latter relates to activities of government that are redundant, overlapping and results in multiple inspections and confusing policy and requirements that serve as impediments to food business and potential investments. Reference is made to the specific Sow's of the project.

Primary Activities

Frozen Import Meat and Perishable Food Control Regulations

For some number of years, the meat importing industry has raised the complaint that the shipping requirements for frozen imported meats in the Ministry of Health regulations do not meet international standards. The regulations ultimately result in the rejection of wholesome and safe meat and meat products needlessly and at great cost to the importing meat processing industry in Jordan. During this mission, this consultant was requested to attend a High Development Ministerial meeting to provide information related to the impact of the existing regulations and the conformity of these regulations to international standards. Industry representatives were also present to voice their concerns for the continuation of the policy. The Consultant was requested at this meeting to serve as an international scientific expert advisor to a Special Committee that was appointed to review the problem. Recommendations from the Special Committee were to be made within a one week.

The consultant prepared a fact paper on the policy, regulation and the scientific evidence that was available, including recommendations by international standardizing bodies, which supported changes in this policy. The consultants further recommend changes in the regulation and prepared a draft regulation which incorporated the international recommendations. The Special Committee accepted the consultants recommendation, however relinquished control for drafting the implementing regulation to the Ministry of Health. The Consultant assisted the MOH

in preparing the new regulation, although several drafts were required to satisfy staff within the MOH. In addition, modern concepts of food control, including the use of selective sampling procedures, reduction of 100% inspection of imported products, and statistical sampling techniques were included. These approaches were addressed to the Food Council of the MOH, the responsible body that approves all food related regulations and food control policy, and approved, in principle, the concepts addressed in the proposed regulation. These concepts can now be incorporated in other regulation and policy revisions that require updating and conformity to international requirements under WTO agreements.

The draft regulation will be issued as part of a broader regulation covering the transportation, storage and display of all food. The regulation will cover food from imported and domestic sources. It contains provisions that are supported by scientifically supportable requirements and meets international standards. The regulation is in a preliminary state and will be finalized and approved by June 2000. The regulation embodies concepts of food control, which represent modern approaches consistent with international norms and meet WTO SPS requirements.

Shelf Stable Foods and the Jordanian Standards for Shelf Life

The Working Party of the WTO identified a Jordanian food standard for shelf life requirements for foods as a possible trade barrier. The GOJ agreed to review the standard. During the mission this consultant provided recommendations to revise the standard and assisted in the development of the revised standard. The revision of the standard resulted in the removal of all products that are shelf stable and do not need shelf life requirements, as indicated in the Codex Labeling Guidelines for Packaged Foods. In addition, the shelf life periods proscribed in the standard for all food products that are best determined by the manufacture or supplier of the food have been eliminated from the standard. All food products that are not listed in the standard are to declare a “best used by” or “best before” date as determined by the manufacture or supplier. A limited number of products (approximately 45 products) continue to have proscribed shelf life and represent products that are not significant products in international trade with Jordan or represent traditional foods trade within Jordan. The revised standard is to be reviewed and approved by a technical committee, circulated for comment and submitted to the Standards Board for final approval. It is anticipated that the standard will be approved by the June 30 2000 commitment date to the WTO.

Other Activities

Import Food Procedures

Although a serious effort was made by the consultant to visit the Port of Aqaba, where most imported food products enter Jordan, the visit was did not take place. An assessment of the procedures and circumstances is necessary in order to make appropriate recommendations and assist in implementing changes necessary to streamline the imported food control procedures. Arrangements were made by the Ministry of Health but later cancelled by the Secretary General, perhaps due to a misunderstanding. This visit will be a priority matter during the consultant’s subsequent visit to Jordan during April/June 2000.

Training Plan

A training plan related to SPS activities was developed listing anticipated training to take place during subsequent visits by the consultant. The plan was provided to AMIR for planning and coordination. The plan was developed in conjunction with activities of Consultant Kim Hjort, Agriculture ministry advisor. Joint activities are planned where possible.

Awareness Seminars for Private Sector

Meeting was held with AMIR's Zaki Ayoubi, Component Leader for Business Associations, related to the development of a series of seminars to be conducted for industry and business associations. The purpose of these meeting are to create the needed awareness of the relationship of the WTO membership to the many reforms and changes underway in up-grading food safety control. In addition, it is expected that the associations can become advocates for support for reform and technology forcing activities in Jordan.

Official Visit by US Delegation

The consultant also devoted several days to assist a delegation from the USA on official visit to Jordan related to assessing the progress being made on revision of the shelf life standard and the need for technical assistance to Jordan.

Proposed Food Control Institution

Other activities included the preparation of a proposal for a scheme to institute a supervisory food control agency at the Prime Minister level of government. This new institution would have oversight responsibilities over all agencies of government with food control authority. This consultant was requested by the WTO Unit of the Ministry of Industry and Trade to draft a proposal for such an institution, based on a request by the Prime Minister to all relevant government departments. The proposal was based on the premise that no competent organization would be eliminated, or suffer any budget or staffing losses or have its authority diminished. The new institution would coordinate food control policy by providing oversight, guidance and approve programs, technical regulations, standards and policy developed by the competent organizations. The proposal was prepared and provided to the MIT/WTO Unit. Following this, a number of other organizations requested information and were provided copies of the proposal entitled "Proposed Scheme for the Coordination and Control of Official Food and Drug Activity in Jordan"

Daily Schedule of Activities

The following represents the day to day activities carried out during the travel period from 29 January to 15 March 2000.

29 Jan.	Depart Houston, Texas (4:30 PM)
30 Jan.	Arrive Amman, Jordan (11:00 PM)
31 Jan.	<p>Meeting with WTO Unit, Ministry of Industry and Trade – to brief on the scope of this portion of the project mission and to be briefed on current issues. (1-2 PM).</p> <p>Meeting with Andrew Griminger, AMIR, general security briefing and mission briefing. (Substituting for Steve Wade-2:30 - 3:15 PM).</p>
1 Feb.	<p>Meeting with representatives of the Ministry of Planning, Nesreen Barakat, Director National Competitive Team, and Mahammad Jaljouli, Researcher, related to the issues raised during a Dec. 99 workshop on cold food chain and perishable and highly perishable food standards. Issues pertain particularly the policies and regulations of the Ministry of Health regulations on shipment requirements of Frozen Imported Meat. (11:00 - 12:00 PM).</p> <p>Meeting with the Ministry of Health, Food Hygiene Directorate (FHD) related to obtaining copies of all existing food health regulations currently in effect. Purpose is to review them for conformity with WTO requirements related to the SPS agreement. Also discussed the acceptable approaches and their cooperation in this review. Letter of request from AMIR is required. (12-1 PM).</p> <p>Meeting with USAID, Jamal Al-Jariri, to discuss scope of the mission and potential issues to be addressed.</p>
2 Feb.	<p>Meeting with JISM to address the issues of the Shelf Stable foods and the JISM shelf life standards. Also discussed the review of all Jordanian food standards for conformity with international standards and with WTO. Letter from AMIR to JISM to request the standards would be helpful. (10-12 PM).</p> <p>Meeting with Representatives of the Ministry of Planning to discuss the consultants views on the recommendations resulting from a workshop/seminar conducted by the MOP in December 1999 on the shipment requirements of Frozen Imported Meat. This is a major source of the complaint from the importers, shippers, and meat processors in Jordan. The Australian, New Zealand, and USA embassies are closely monitoring the issue. Agreed with their approach and recommendations with some informal suggestions on refinement and minor revisions. Consultant may be invited to attend meeting of High Development Council to discuss the matter (2-5pm).</p>
3 Feb.	Meeting scheduled with Consultant Kim Hjort related to controversy over jurisdictions between MOA and MOH and the authorities granted in the

	<p>new proposed food law was postponed until 4 Feb.</p> <p>Invited to attend the High Development Ministerial Council Meeting chaired by the Minister of Planning on the Frozen Imported Meat shipment requirements. Requested by the Minister of Planning to serve as technical advisor to a Special Technical Committee to review and recommend needed changes to the regulation. Ministry of Health is to be the lead agency in this effort. (5 PM-9 PM).</p>
4 Feb.	<p>Holiday</p> <p>Met with Consultant Kim Hjort related to current jurisdictional dispute between the MOH and MOA which is apparently holding up any action on the processing of the new food law. Agreed to prepare a document on the subject related to common and usual jurisdictions for both agencies based on international observations related to food control issues. Discuss training plans and means by which we can collaborate on some common training.</p>
5 Feb.	<p>Reviewed regulations for shipment requirements of imported frozen meat in preparation for meeting with MOA later in the week.</p> <p>Reviewed JISM Shelf Life Standards, JS 288 & JS 401 in preparation for the Meeting with JISM scheduled for 6 Feb.</p>
6 Feb.	<p>Meeting with JISM on the shelf life standards and the draft revised standard. Spent entire day going over the proposed revised standard.</p>
7 Feb.	<p>Continuation of review draft standard on shelf life started on the previous day.</p> <p>Drafted official letters requesting JISM to provide copies of all food standards and for MOH to provide copies of current Technical (Health) regulations related to food controls. Letters to be sent by AMIR.</p> <p>Prepared 2 page summary of issues related to SPS-Foods for AMIR</p>
8 Feb.	<p>Prepared plan to identify the activities needed to accomplish the SOW of this and future missions.</p> <p>Completed review of the draft shelf life standard and started on redrafting of standard based on my recommendations to follow Codex.</p> <p>Reviewed health regulations on frozen foods products in preparation for meeting with MOH on 9 Feb.</p>
9 Feb.	<p>Meeting with MOH/FHD - all day - related to the obtaining copies of all health regulation, and systematic review for conformity with SPS. Committee to be appointed to assist in the task. Copies of regulations to be provided to AMIR. Discussed inspection procedures and possibility of travel to Aqaba for to allow for first hand observations.</p>
10 Feb.	<p>Review documentation on workshop and complaints related to the shipment of frozen foods. Prepared draft position paper on basis of review on problem and possible solutions in preparation for technical committee meeting scheduled for 12 Feb.</p>
11 Feb.	<p>Holiday</p>

12 Feb.	All day meeting at MOH/FHD reviewing technical requirements for shipment of frozen imported meat. Committee decided to accept IIR and Codex recommendations and requested the Consultant to draft an implementing regulation. Committee relinquished control over the implementing regulation to MOH from this point.
13 Feb.	Meeting with MOH/FHD, related to food inspection, import procedures and risk analysis in decision making(9:00 AM- 3:00PM).
14 Feb.	Draft of implementing standard for shipment prepared. IBLA requested information on any revisions needed for the proposed food law. Invited to and attend evening reception for Min. Agriculture, for Western Australia, visiting Jordan with a delegation. Invitation was offered because of their interest in the shipment of frozen meat problem.
15 Feb.	Reviewed food law again, prepared comments on minor revisions to be considered and sent by email after discussion by telephone. Continued on first draft of shipment of frozen meat regulation.
16 Feb.	Discussions with Quality Foods related to food importation in Jordan, particularly meat. Completed first draft of regulation. Australian Embassy requested meeting on 17 Feb to discuss importation of frozen meat in Jordan
17 Feb.	Meeting with MOH/FHD staff to discuss draft regulation. Requires more work. Discussed travel to Aqaba, MOH/FHD will arrange for next week and advise (possibly Sunday 20 Feb). (9-2:PM). Meeting with Australian Embassy trade rep. Simon Twisk related to shipment of frozen meat and on import procedures in general. (3-4 PM) Met with Tony Martin, Australian Veterinary Service, conducting workshop on risk analysis for animal health at MOA. He would like to collaborate in future for risk analysis training session to include food and MOA, MOH, and JISM. Agreed to consider it. (4-5 PM).
18 Feb	Holiday
19 Feb.	Re-review standard on shelf life and prepared draft standard to serve as a discussion document for next meeting with JISM. Redrafted the shipment of frozen meat regulations for meeting scheduled on 20 Feb.
20 Feb.	Meeting with MOH/FHD all day to discuss draft regulation. More work is needed. No decision on Aqaba yet.
21 Feb	Redrafted shipment of frozen meat regulations. Started review of import procedures of MOH in preparation for Aqaba visit. Meeting with Farhat Farhat, general briefing on activities and problems.

	Meeting with Quality Foods personnel on progress on shipment of frozen meat regulations. Obtained copy of Chamber of Commerce version of a new food law (Arabic) to be translated and reviewed. AMIA to arrange for translation. (1-2:30 PM).
22 Feb.	<p>Telecom from MOH, trip to Aqaba denied by MOH, Secty Gen. Faxed 4th version of draft regulation to MOH, MOP.</p> <p>Meeting with Dajani Consulting Company regarding Palestinian Turkey Import Rejects by Jordan due to pinfeathers. Special problem here is that the import rejection results in complete product loss due to product destruction, since rejected products can not be returned to the Palestinian Territory. (3:30-5:00PM)</p> <p>Since travel to Aqaba was cancelled, arrangements were made for meetings with JISM to finalize effort on shelf life standard.</p>
23 Feb.	<p>Meeting with MOH regarding food control at the border (9-11:30PM).</p> <p>Meeting with Sameera Qadoura, AMIR regarding training plan for the SOWs involved with this consultant's project activity (3:00-4:00 PM).</p>
24 Feb.	<p>Meeting with Tamam Al-Ghoul, MIT/WTO Unit, at her request. She requested that I prepare a proposal related to setting up an oversight organization at the Prime Minister Dept. to supervise all food control agencies in GOJ. The proposal is urgently needed for a ministerial meeting scheduled within three or four days. The proposal is to be based on the following: It is not to affect any changes on the existing government food control organizations, their resources or staffing or their responsibilities. No movement of personnel is anticipated with the exception of those who will staff the new oversight organizations. The oversight responsibilities will include the review of existing and new policies, procedures and requirements to assure appropriate application and to comply with WTO requirements. Other ministries have been requested to bring forward their proposals as well. (9:30-10:30 AM)</p> <p>Meeting with JISM re shelf standards rest of day. Went over entire existing standard and my recommendations. Revised standard to be prepared based on my recommendations and presented to the Technical Committee.</p>
25 Feb.	<p>Holiday</p> <p>Meeting with Kim Hjort regarding training plans for collaboration and coordination and on work plans to see where there is also additional possibility for cooperation and coordination. Agreed to carry out jointly the workshop on developing a certificate for import certification of various SPS matters, and to see if the Risk Assessment training could be done jointly.</p>
26 Feb.	Attended the 6th meeting with the MOH related to the shipment requirements for frozen meat. Presented the revised regulation to the Committee and discussed it the entire day.
27 Feb.	Met with the Standards unit of JISM most of the day and completed the review of the revised shelf life standard. Next step is to present the

	standard to the technical committee for discussion and approval.
28 Feb.	<p>Meeting scheduled with MOA and Farhat was cancelled</p> <p>Met with IBLA staff to provide a briefing and to be briefed on various matters including status of the food law, prospects for a new FDA type organization at the Prime Minister Department, shelf life standard, status of the Standards and Metrology Law, etc (3:00-4:30PM).</p>
29 Feb.	<p>Meeting with USAID and US Team of delegates visiting Jordan to follow up on the shelf life standard commitment due by June 30 and to determine what appropriate follow up technical assistance is needed and to make necessary plans. Decision was made that I should accompany the US Team. (10:00-12:00 and Lunch)</p> <p>Accompanied the US Team to the WTO Unit MIT for overall briefing of the Unit on purpose and objectives of the visit: check on the progress of the shelf life standards and to determine if any technical assistance is needed. Tamam El Ghul requested that they concentrate on providing reasonable and practical alternatives to the shelf life requirements that assures the public the same type of protection. (2:30-4:00PM).</p> <p>Tour of major retail market, C-Town, met with the owners and discussed in depth problems associated with importation of food products. Most of the import food problems are the rigid and inflexible requirements of the MOH. Shelf life monitoring practices are carried out by store personnel however some products are missed and the local municipality health authorities condemn the products for destruction. 4:30-6:00pm</p> <p>Dinner with the US Team to discuss the subject of their visit in depth.</p>
1 Mar.	Accompanied the US Team to JISM, MOH and MOA. Openly discussed the importance of shelf life dating to the Jordanian consumer. Diner again with the US Team. (ALL DAY).
2 Mar.	<p>Meeting of the Technical Committee for Shipment requirements of imported frozen meat (seventh session). Consultant revised the regulation again. Meeting did not result in acceptance. Debated the same issues repeatedly, even those issues that were agreed to in previous meetings. (9:00 - 11:00 AM)</p> <p>Meeting at the WTO Unit, for debriefing of the US Team. 11:30-12:30PM)</p> <p>Lunch at the invitation of the Australian Embassy with representatives of the Australian Meat Industry, the Australian Veterinary Service and Australian Quarantine Inspection Service. Discussion held on the frozen meat shipment requirement (1-3:00PM).</p>
3 Mar.	<p>Holiday</p> <p>Prepared proposal for restructuring food control in Jordan as requested by the WTO Unit MIT.</p> <p>Prepared Training plan for next mission to Jordan for AMIR</p>

	Reviewed the final draft of the Shelf Life Standard for JISM before submission to the Technical Committee for consideration.
4 Mar.	Prepared the 8 th version of the regulation for shipment requirements of frozen imported meat.
5 Mar.	<p>Attended the 8th meeting of the Technical Committee for shipment requirements of frozen imported meat at MOH. Document accepted and will be translated to Arabic and presented to the MOH food Council for approval (9:00-12:30 PM).</p> <p>Meeting and Lunch with Farhat Farhat to discuss progress of mission and status of Jordan commitments on food control issues, outcome of the US Team visit, and status of the regulation on shipment requirements for imported frozen meat (1:00-2:00PM)</p> <p>Dinner with Wayne Cassette, Consultant for the organization and implementation of a national reference laboratory system in Jordan, Discussed the approach being considered, the impact on existing laboratories performing food analysis, training and equipment needs and capability, etc.</p>
6 Mar.	<p>Meeting with JISM and completed discussions on the revised shelf life standard. Also discussed the restructuring of food control in Jordan and provided copy of the proposal. Director of the Standards Division of JISM has been appointed to a Committee to review and make recommendations to the Cabinet on the proposal. (9:30-11:00 AM).</p> <p>Meeting with MOH related to the restructuring of food control in Jordan. Provided copy of the proposal. Also discussed my disappointment in the cancellation of the travel to Aqaba and the importance of the visit to the evaluation of import procedures. They will arrange during the next mission (11:30-1:30PM).</p> <p>Meeting with MOA related to the restructuring of food control in Jordan. Provided a copy of the proposal. (2:00-4:00 PM)</p> <p>Met with Dr. Neil Armitage, New Zealand Min. of Agric. and Food (NZMAF) at his request related to meat regulations in Jordan and the frozen meat shipment requirements (4:30-5:30PM).</p>
7 Mar.	<p>Completed the training plan and sent by email to AMIR</p> <p>Briefing meeting with IBLA</p> <p>Requested by WTO unit to expand the proposal for restructuring food control in Jordan.. Worked on the revised document rest of the day</p>
8 Mar.	Day spent on the expansion of the restructuring document.
9 Mar.	<p>Finished the expanded restructuring document including the charts on current and proposed organizational structure.</p> <p>Final review of the draft regulations of the shipment requirements for imported frozen meat, before being submitted to the Food Council for approval.</p>

10 Mar	Holiday
11 Mar.	<p>Meeting with MOH related to draft regulation for shipment requirements for frozen meat (10-12:30 PM).</p> <p>Meeting with Rima Za'mut, Quality Control Director Quality Foods, related to food inspection frequency for domestic producers, border inspection for imported products, and other food safety issues (3:30-5:00PM).</p>
12 Mar.	<p>Meeting at MOH in preparation for the Food Council Meeting later today. 8:00-10:30AM).</p> <p>Meeting of the Food Council, chaired by the Min. Of Health. Approved the document submitted however not sure about the content of the document.</p>
13 Mar.	<p>Meeting with MOH (Dr Barmawi), Farhat, Raghida and this consultant. General discussion related to progress being made in GOJ commitments (9-10:00).</p> <p>Meeting with WTO Unit related to proposal for restructuring food control in Jordan (10:-10:30AM).</p> <p>Meeting with JISM Technical Committee related to the revised draft shelf life standards. Committee meeting was already under way and this was the first meeting for them to consider the new proposed shelf life standard (11:00-2:00 PM).</p> <p>Meeting scheduled with IBLA, for 3.00 PM was cancelled.</p>
14 Mar.	<p>Breakfast meeting with Steve Wade, Brian O'Shae, and Nicole Joel for briefing on mission. Steve suggested coordination with Zaki Ayoubi to bring business associations in on advocacy. Awareness seminars may also be in order.</p> <p>Meeting with Zaki Ayoubi at Amir to discuss the awareness and advocacy meetings with business associations (10-11:00 AM.).</p> <p>Meeting at MOH related to training needs specifically for MOH to include in the Project training plan (12-1:30 PM).</p> <p>Meeting with industry representatives at the Hotel, final discussions related to the progress made on the frozen meat shipment requirements. Also discussed the possibilities of awareness seminars for industry members.</p>
15 Mar.	<p>Depart Amman, KLM 00.35 hours.</p> <p>Ar. Houston, Texas 14.30 (local time)</p>